

September 18, 2008

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: EB Docket 06-36
Axxis Communication, Inc;
Annual CPNI Compliance Certification for 2007

Dear Ms. Dortch:

Pursuant to 47 C.F.R. § 64.2009(e), the undersigned officer of Axxis Communication, Inc. (hereinafter referred to as the "Company") certifies based on personal knowledge that the Company has established and implemented policies and procedures to protect customer proprietary network information ("CPNI") from unauthorized disclosure. These policies and procedures substantially comply with the Commission's rules in 47 C.F.R. Part 64, Subpart U.

This certification is provided out of an abundance of caution. Some uncertainty exists as to whether the Company's operations require implementation of specific procedures to comply with the CPNI rules. The Company does not use CPNI in its marketing; does not disclose call detail information to anyone, including customers; and does not share CPNI with any third-party other than its billing agents, who already possess that same information as a result of being the marketing agents for the Company's services and as a result of also providing their own services to the same end users.

The Company is certificated as a competitive local exchange carrier ("CLEC") in Oregon. Its primary line of business is providing wholesale services to Internet Service Providers ("ISPs") who use the wholesale services in the provision of their own services, including bundling of the wholesale services with Internet access service. Axxis also provides unlimited flat-rate toll and special access services to end users. These services are marketed exclusively by ISPs and network integrators in conjunction with their own services, which include Internet, information, and data services, as well as network design and integration services. These ISP/network integrators act as marketing agents and as billing agents for Axxis.

The Company utilizes appropriate safeguards, such as firewalls, to prevent unauthorized intrusion into its electronic systems, including those containing CPNI.

All personnel are required to access, use, and disclose CPNI only for purposes of providing services to customers. Failure to abide by this requirement is cause for discipline, which may include termination of employment.

The Company does not provide call detail information to customers in any manner. Accordingly, the Company did not implement additional policies and procedures related to access to or disclosure of call detail records by December 8, 2007.

The Company has no parent or subsidiary companies, nor does it have any joint-venture partners; thus it does not share CPNI with such entities. Other than the ISP/network integrators to whom it provides wholesale services and who act as marketing and billing agents for Axxis' toll and special access services, the Company has no independent contractors. The Company discloses CPNI to its billing agents for purposes of billing, but those agents already possess that same information as a result of having acted as the marketing agent for Axxis, having designed the comprehensive voice and data solution for the end user, and providing their own Internet and information services to the same end user. This is especially true because Axxis' services are billed on a flat-rate basis, which means that billing information is limited to the monthly charge for flat-rate toll services and the monthly charge associated with each special access circuit. The Company has ensured, however, that each of its agents protects CPNI substantially in compliance with the Commission's rules. The Company does not disclose CPNI to other third parties except that it would do so at the direction of the customer or as required by law.

The Company does not utilize CPNI in out-bound marketing campaigns. The Company will report to the Commission instances, if any, in which opt-out mechanisms do not work properly.

The Company will report security breaches via the Federal Communications Commission's website as soon as practicable but no later than seven days after discovery. The Company will notify customers of each breach on or after the eighth day after reporting it unless law enforcement directs otherwise. The Company maintains records of breaches for at least two years.

During the certification year, the Company neither has instituted proceedings nor has filed any petitions against data brokers; nor has the Company received information to suggest that pretexters have attempted to gain access to its customers' CPNI. The Company has received no customer complaints in the past year regarding unauthorized access to or disclosure of CPNI.

Sincerely,

A handwritten signature in black ink, appearing to read "Dan Bubb", written in a cursive style.

Dan Bubb, President